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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

ROBERT M. SNEE and SHERICE D.  
SNEE, guardian ad litem for  
O.D.S., a minor,

CV '08-915--BR  
COMPLAINT

Plaintiffs,  
vs.

Unfair Debt Collection  
Practices; Violation of  
15 USC §1692 (FDCPA)

COLUMBIA COLLECTION SERVICE,  
INC.,

DEMAND FOR JURY TRIAL

Defendant.

I. PRELIMINARY STATEMENT

1. This are actions for money damages brought pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 USC §1692, et. seq.

2. Plaintiffs' claims arise from defendant's attempts to collect debts in Oregon through means and facilities of interstate commerce and the U.S. mails.

# 22385

## II. JURISDICTION

3. Jurisdiction arises under 15 USC §1692k(d).

## III. PARTIES

4. Plaintiff Robert M. Snee is a natural person residing in Multnomah County, Oregon.

5. Plaintiff Sherice D. Snee is the guardian ad litem for O.D.S., a natural person and a minor residing in Multnomah County, Oregon.

6. Defendant Columbia Collection Service, Inc. is an Oregon corporation and a debt collector.

## IV. FACTUAL ALLEGATIONS

7. Northwest Primary Care Group, P.C., is an Oregon professional corporation, providing medical services.

8. On or before July 31, 2007, plaintiff Robert M. Snee was obligated, in a disputed amount, for consumer debt incurred for services provided by Northwest Primary Care Group, P.C. to Robert M. Snee.

9. On or before July 31, 2007, plaintiff O.D.S., a minor, and Sherice D. Snee, her parent were liable for consumer debt incurred for services provided by Northwest Primary Care Group, P.C. to Plaintiff O.D.S.

## V. FIRST CLAIM OF RELIEF FOR PLAINTIFF ROBERT M. SNEE

10. Paragraphs 1 through 9 are re-alleged and incorporated by reference.

11. Within the year preceding filing of the complaint and during the course of attempting to collect the debt, defendant communicated with plaintiff Robert M. Snee and with third parties in violation of 15 USC §1692c(b).

12. Within the year preceding filing of the complaint and during the course of attempting to collect the debt, defendant communicated with plaintiff Robert M. Snee and with third parties the natural consequences of which was to harass, oppress and abuse plaintiff in violation of 15 USC §1692d.

13. As a result of defendant failing to comply with the FDCPA, plaintiff Robert M. Snee suffered actual damages.

14. Pursuant to 15 USC §1692k(a)(1), defendant is liable to plaintiff for his actual damages.

15. Pursuant to 15 USC §1692k(a)(3), plaintiff is entitled to his attorneys fees and costs.

#### VI. SECOND CLAIM OF RELIEF FOR PLAINTIFF ROBERT M. SNEE

16. Paragraphs 1 through 9 are re-alleged and incorporated by reference.

17. Within the year preceding filing of the complaint and during the course of attempting to collect the debt, defendant communicated with plaintiff Robert M. Snee and with third parties in violation of 15 USC §1692c(b).

18. Within the year preceding filing of the complaint and during the course of attempting to collect the debt, defendant communicated with plaintiff Robert M. Snee and with third parties the natural consequences of which was to harass, oppress and abuse plaintiff in violation of 15 USC §1692d.

19. Pursuant to 15 USC §1692k(a)(2)(A), defendant should be held liable to plaintiff Robert M. Snee for \$1,000.

20. Pursuant to 15 USC §1692k(a)(3), plaintiff is entitled to his attorneys fees and costs.

VII. THIRD CLAIM OF RELIEF FOR PLAINTIFF SHERICE D SNEE,  
GUARDIAN AD LITEM FOR O.D.S.

21. Paragraphs 1 through 9 are re-alleged and incorporated by reference.

22. Within the year preceding filing of the complaint and during the course of attempting to collect the debt, defendant communicated with O.D.S. and falsely represented the amount of the debt in violation of 15 USC §1692e(2)(A).

23. Within the year preceding filing of the complaint and during the course of attempting to collect the debt, defendant communicated with O.D.S. and failed to send O.D.S., within five (5) days of their initial communication, the notice and information required by 15 USC §1692g(a).

24. Pursuant to 15 USC §1692k(a)(2)(A), defendant should be held liable to plaintiff O.D.S. for \$1,000.

25. Pursuant to 15 USC §1692k(a)(3), plaintiff is entitled to her attorneys fees and costs.

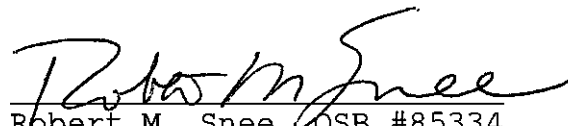
WHEREFORE, plaintiffs demand judgment in their favor and against defendant as follows:

Under his first claim of relief, for his actual damages, his reasonable attorney fees, and costs,

Under his second claim of relief, for an award of \$1,000 in statutory damages, his reasonable attorney fees and costs,

Under her third claim of relief, for an award of \$1,000 in statutory damages, her reasonable attorney fees and costs.

DATED August 1, 2008.

  
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